

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

SANDRA WILLIAMS,)	
)	
Plaintiff,)	Cause No.:
)	
vs.)	
)	
EE-JAY MOTOR TRANSPORTS, INC. and)	
JOHN JEFFREY,)	
)	
Defendants.)	JURY TRIAL DEMANDED

NOTICE OF REMOVAL

COMES NOW Defendant, EE-Jay Motor Transports, Inc., by and through its attorneys, Roberts Perryman, P.C., and hereby files its Notice of Removal stating the following:

INTRODUCTION

1. A civil action has been commenced and is now pending the Circuit Court of St. Louis County, State of Missouri, Case No. 18SL-CC04693, wherein Sandra Williams is the Plaintiff and EE-Jay Motor Transports, Inc. and John Jeffrey (spelled incorrectly in Plaintiff's Petition as "Jefferrey") are the Defendants.

2. This action is a civil action wherein Plaintiff has made claims for damages as a result of Defendants' alleged negligence in connection with a motor vehicle accident that allegedly occurred on August 27, 2018.

3. Defendant EE-Jay Motor Transports, Inc. has been served with Plaintiff's Petition and consents to removal.

4. Defendant John Jeffrey has been served with Plaintiff's Petition and consents to removal.

DIVERSITY OF CITIZENSHIP EXISTS

5. This action is a civil action, of which the United States District Courts have original jurisdiction pursuant to 28 U.S.C. § 1332, and is one which may be removed to this Court by Defendant pursuant to 28 U.S.C. § 1441, and this is a civil action proceeding involving diversity of citizenship.

6. Plaintiff Sandra Williams is a citizen of the State of Missouri.

7. Defendant EE-Jay Motor Transports, Inc. is a Delaware corporation with its principal place of business in Illinois.

8. Defendant John Jeffrey is a citizen of the State of Illinois.

THE AMOUNT IN CONTROVERSY HAS BEEN SATISFIED

9. The amount in controversy exceeds \$75,000.00 exclusive of interest and costs. Defendant requested that Plaintiff's counsel sign a Stipulation that damages would not exceed \$75,000.00, which Plaintiff's counsel would not do because Plaintiff is still currently undergoing medical treatment and he does not know what her total medical bills will be. It is not known whether Plaintiff will require future treatment or even surgery that will be alleged to have been caused by this accident. Defendant also requested copies of Plaintiff's medical records and bills but has not received them as of the date of filing this removal. Because this is a personal injury action where Plaintiff claims damages for injuries to her neck, back and hip, *future* medical treatment and makes a claim for property damage, Defendant believes the amount in controversy shall exceed the minimum jurisdictional amount, whereas the amount in controversy requirement is satisfied.

NOTICE OF REMOVAL IS TIMELY

10. Less than thirty (30) days have elapsed since receipt of said initial pleadings by Defendant, EE-Jay Motor Transports, Inc.

11. Defendant John Jeffrey has been served with Plaintiff's Petition and has consented to this removal. Defendant has filed Jeffrey's Consent with its removal papers.

12. Defendant files herewith a copy of all process, pleadings, and order served upon it in this action. See *Exhibit A*.

WHEREFORE, Defendant, EE-Jay Motor Transports, Inc. prays the Court to accept its Notice for Removal, and make and enter such orders as may be necessary to effect the complete removal of this action from the Circuit Court of St. Louis County, State of Missouri, to the United States District Court for the Eastern District of Missouri, and that further proceedings be discontinued in the State Court and all future proceedings be held in this Court, as the laws in such case provide.

Respectfully submitted,

ROBERTS PERRYMAN, P.C.

/s/ Ted L. Perryman

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Attorneys for Defendants EE-Jay Motor Transports, Inc.

CERTIFICATE OF SERVICE

The undersigned certifies that on this 1st day of February, 2019, copies of the foregoing were served on the following counsel of record via the Court's ECF filing system:

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/s/ Ted L. Perryman _____